

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:19CR00238 HEA/PLC
)	
ELIJAH ROBERTS,)	
)	
Defendant.)	

GOVERNMENT’S MOTION FOR PRETRIAL DETENTION

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Paul D’Agrosa, Assistant United States Attorneys for said District, and moves the Court order the detention of Defendant pending trial. As and for its grounds, the United States of America states as follows:

1. Defendant is charged by way of Indictment with armed carjacking, in violation of 18, United States Code, Section 2119, and brandishing a firearm in furtherance of a crime of violence, in violation of Title 18, United States Code, Section 924(c).

2. Accordingly, a rebuttable presumption arises, pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which would reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. Defendant was arrested by St. Louis City Police, following an approximately 45 minute high-speed chase. Defendant was fleeing police in a stolen vehicle which he had carjacked from the victim in St. Louis City. At the time of the carjacking, the victim was placing her two small children in their car seats. Defendant approached her, brandished a silver gun and

demanded the victim's car keys. Defendant drove off with one of the victim's children still in the stolen car. The toddler was eventually released unharmed and found by a police officer in an alley. Defendant rammed a police car during the high-speed chase, and also caused property damage to at least two vehicles. The only reason Defendant stopped was because the car was so damaged, it simply quit running. Defendant then resisted arrest.

4. Defendant waived his Miranda rights and admitted to police that he used a silver revolver to rob the victim of her vehicle.

5. Defendant is in federal custody following a writ, as he stands charged in the Circuit Court of St. Louis City with the following:

1822-CR00018 – Felony Resisting Arrest – Cash bond, not posted;
1822-CR00541-01 – Robbery 1st Degree, Armed Criminal Action, Child Kidnapping, Endangering the Welfare of a Child, Resisting Arrest by Flight, Armed Criminal Action, Leaving the Scene of an Accident and felony Property damage - \$350,000 Cash Only Bond, not posted;
1722-CR04882-01 – felony Possession of a Controlled Substance, Unlawful Possession of a Firearm and Tampering - \$30,000 Cash Only Bond, not posted.

6. Pursuant to Title 18, United States Code, Section 3142(g), because:

- (a) the weight of the evidence against defendant is substantial;
- (b) the defendant's history and characteristics indicate an escalation in violence;
- (c) and the nature and seriousness of the offense indicates that Defendant poses a danger to any person or the community, which is demonstrated by Defendant's criminal history and the fact that he took a child during a carjacking.

There are no conditions or combination of conditions that would ensure the safety of the community and warrant Defendant's release pending trial.

WHEREFORE, the Government requests this Court grant the Government's motion to detain and order the detention of Defendant pending trial.

Respectfully submitted,

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